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8 [Proposed] General Insolvency Counsel for
Debtor and Debtor-in-Possession

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SANTA ANA DIVISION**

13
14 In re

15 EARTHONE CIRCUIT TECHNOLOGIES
16 CORPORATION, a Delaware corporation,

17 Debtor and
18 Debtor-in-Possession.

Case No. 8:17-bk-12521 CB

Chapter 11

**DEBTOR'S EX PARTE APPLICATION
FOR EXTENSION OF TIME TO FILE
SCHEDULES, STATEMENT OF
FINANCIAL AFFAIRS, LIST OF
EXECUTORY CONTRACTS AND
UNEXPIRED LEASES, AND CREDITOR
MATRIX TO ACCOMPANY
SCHEDULES; DECLARATION IN
SUPPORT THEREOF**

[No Hearing Required]

**TO THE HONORABLE CATHERINE BAUER, UNITED STATES BANKRUPTCY
JUDGE; AND INTERESTED PARTIES:**

EarthOne Circuit Technologies Corporation, the debtor and debtor-in-possession in the above-captioned bankruptcy case (“Debtor”), hereby respectfully applies, ex parte, to this Court for an extension of time, through and including July 14, 2017, within which to file its Schedules of Assets and Liabilities, Statement of Financial Affairs, List of Executory Contracts and Unexpired Leases, and Creditor Matrix To Accompany Schedules, and any additional ancillary documents ordinarily filed with the Schedules (collectively, referred to herein as the “Schedules”), based on the following facts and circumstances:

1. On July 21, 2017 (the “Petition Date”), the Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is managing its financial affairs as a debtor-in-possession pursuant to Sections 1107 and 1108 of Title 11 of the United States Code (“Bankruptcy Code”).

2. The Debtor has only one employee, Douglas Molyneux.

3. Pursuant to Rule 1007 of the Federal Rules of Bankruptcy Procedure, a debtor must file its Schedules within fourteen (14) days from the entry of the order for relief. Accordingly, in this case, the Schedules are due to be filed on or before July 5, 2017.

4. The Debtor was formed on August 4, 2010. The Debtor initially was formed as a Wyoming corporation. Since July 2012, the Debtor has been a corporation duly organized and existing under the laws of the State of Delaware.

5. The Debtor was founded to develop and market “eSurface”™ technology, patent-protected intellectual property for the manufacture of printed circuit boards and other electronic components. The Debtor believes that the eSurface technology provides substantial direct process cost savings over current manufacturing technology, and almost completely eliminates toxic waste generated by conventional manufacturing methods. The Debtor believes that the eSurface technology is potentially a transformative technology and will provide to printed circuit board and other electronics manufacturing unprecedented efficiencies and capabilities, with

1 lower costs, allowing companies to build electronics less expensively, smaller and with more
2 functionality.

3 6. The Debtor does not manufacture products. Rather, the Debtor licenses its
4 technology to manufacturing companies, particularly in the printed circuit board industry.

5 7. While the Debtor's initial business strategy focused on marketing to the printed
6 circuit board manufacturing industry, the Debtor believes that the eSurface technology can be
7 used in a variety of market segments and applications, including communications, automotive,
8 military/aerospace, solar energy production and medical products.

9 8. The Debtor has determined that the best means to preserve the value of the
10 Debtor's assets is for the Debtor to pursue, as expeditiously as possible, a sale and assignment of
11 substantially all of the Debtor's assets ("Assets") pursuant to Sections 363 and 365 of the
12 Bankruptcy Code.

13 9. In furtherance of this course of action, on June 28, 2017, the Debtor filed its
14 Motion For Order: (1) Approving Sale And Bidding Procedures In Connection With The Sale Of
15 Assets Of The Debtor's Estate Free And Clear Of Liens And Interests; (2) Setting A Hearing On
16 Sale Motion; And (3) Approving Form And Manner Of Notice To Be Provided To Creditors And
17 Parties-In-Interest In Connection With Sale Motion ("Sale Procedures Motion").

18 10. Because of the Debtor's desire to file immediately the Sale Procedures Motion, and
19 because of the fact that the Debtor has but one employee, the Debtor has been unable to devote the
20 time required to accurately complete the Schedules.

21 11. The Debtor is making progress to prepare the Schedules. However, in addition to
22 the filing of the Sale Procedures Motion, the Debtor has also been compiling the documents in
23 compliance with the Guidelines mandated by the Office of the United States Trustee. Further,
24 because of the upcoming 4th of July Federal holiday, the Debtor will not been able to complete the
25 task of preparing the Schedules for timely filing.

26 12. For the foregoing reasons, the Debtor is unable to prepare and file its Schedules
27 within the prescribed time and, accordingly, requests an extension, through and including July 14,
28 2017 within which to prepare and to file the Schedules. This date is three weeks prior to the date

1 that the Office of the United States Trustee has set for the first meeting of creditors to be held
2 under Section 341(a) of the Bankruptcy Code in this case and, therefore, the Office of the United
3 States Trustee should have time sufficient to review the Schedules and prepare for the first
4 meeting of creditors.

5 13. The Debtor is very aware of the importance of the Schedules, and the fact that the
6 Schedules must be complete and accurate; however, as indicated above, preparation of complete
7 and accurate Schedules within the required time period is not possible.

8 14. This is the Debtor's first request for an extension of time to prepare and file the
9 Schedules.

10 **WHEREFORE**, based upon the foregoing, the Debtor respectfully requests that the Court
11 enter an Order extending, through and including July 14, 2017, the time for the Debtor to file its
12 Schedules.

13 DATED: June 30, 2017

WINTHROP COUCHOT
GOLUBOW HOLLANDER, LLP

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16 By: /s/ Andrew B. Levin
Andrew B. Levin
17 [Proposed] General Insolvency Counsel for
18 Debtor and Debtor-in-Possession
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DECLARATION OF DOUGLAS MOLYNEUX

I, Douglas Molyneux, declare and state:

1. I am the Corporate Secretary and only employee of EarthOne Circuit Technologies Corporation, the debtor and debtor-in-possession herein (the "Debtor"). The facts stated herein are within my personal knowledge and, if called upon as a witness, I could and would competently testify thereto.

2. This declaration is offered in support of the Debtor's Ex Parte Application for Extension of Time to File Schedules, Statement of Financial Affairs, List of Executory Contracts and Unexpired Leases, and Creditor Matrix to Accompany Schedules ("Application").

3. The Debtor is requesting an extension of time, through and including July 14, 2017, within which to file the Schedules of Assets and Liabilities, Statement of Financial Affairs, List of Executory Contracts and Unexpired Leases, Creditor Matrix To Accompany Schedules, and any additional ancillary documents ordinarily filed with the Schedules (collectively, referred to herein as the "Schedules"), based on the facts and circumstances stated herein.

4. On July 21, 2017 (the "Petition Date"), the Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is managing its financial affairs as a debtor-in-possession pursuant to Sections 1107 and 1108 of Title 11 of the United States Code ("Bankruptcy Code").

5. The Debtor was formed on August 4, 2010. The Debtor initially was formed as a Wyoming corporation. Since July 2012, the Debtor has been a corporation duly organized and existing under the laws of the State of Delaware.

6. The Debtor was founded to develop and market "eSurface"™ technology, patent-protected intellectual property for the manufacture of printed circuit boards and other electronic components. The Debtor believes that the eSurface technology provides substantial direct process cost savings over current manufacturing technology, and almost completely eliminates toxic waste generated by conventional manufacturing methods. The Debtor believes that the eSurface technology is potentially a transformative technology and will provide to printed circuit board and

1 other electronics manufacturing unprecedented efficiencies and capabilities, with lower costs,
2 allowing companies to build electronics less expensively, smaller and with more functionality.

3 7. The Debtor does not manufacture products. Rather, the Debtor licenses its
4 technology to manufacturing companies, particularly in the printed circuit board industry.

5 8. While the Debtor's initial business strategy focused on marketing to the printed
6 circuit board manufacturing industry, the Debtor believes that the eSurface technology can be
7 used in a variety of market segments and applications, including communications, automotive,
8 military/aerospace, solar energy production and medical products.

9 9. The Debtor has determined that the best means to preserve the value of the
10 Debtor's assets is for the Debtor to pursue, as expeditiously as possible, a sale and assignment of
11 substantially all of the Debtor's assets ("Assets") pursuant to Sections 363 and 365 of the
12 Bankruptcy Code.

13 10. In furtherance of this course of action, on June 28, 2017, the Debtor filed its
14 Motion For Order: (1) Approving Sale And Bidding Procedures In Connection With The Sale Of
15 Assets Of The Debtor's Estate Free And Clear Of Liens And Interests; (2) Setting A Hearing On
16 Sale Motion; And (3) Approving Form And Manner Of Notice To Be Provided To Creditors And
17 Parties-In-Interest In Connection With Sale Motion ("Sale Procedures Motion").

18 11. I am informed by my counsel and believe thereon that a debtor must file the
19 Schedules within fourteen (14) days from the entry of the order for relief. Accordingly, in this
20 case, the Schedules are due to be filed on or before July 5, 2017.

21 12. Because of the Debtor's desire to file immediately the Sale Procedures Motion, and
22 because of the fact that I am the Debtor's only employee, I have been unable to devote the time
23 required to accurately complete the Schedules.

24 13. I am making progress to prepare the Schedules. However, in addition to the filing
25 of the Sale Procedures Motion, I have also been compiling the documents in compliance with the
26 Guidelines mandated by the Office of the United States Trustee. Further, because of the
27 upcoming 4th of July Federal holiday, I will not been able to complete the task of preparing the
28 Schedules for timely filing.

1 14. For the foregoing reasons, I am unable to prepare and file the Schedules within the
2 prescribed time and, accordingly, request an extension, through and including July 14, 2017,
3 within which to prepare and to file the Schedules. This date is three weeks prior to the date that
4 the Office of the United States Trustee has set for the first meeting of creditors in this case and,
5 therefore, I believe that the Office of the United States Trustee will have time sufficient to review
6 the Schedules and to prepare for the first meeting of creditors.

7 15. I am very aware of the importance of the Schedules, and the fact that the Schedules
8 must be complete and accurate; however, as indicated above, preparation of complete and
9 accurate Schedules within the required time period is not possible.

10 16. This is the Debtor's first request for an extension of time to prepare and file the
11 Schedules.

12 I declare that the foregoing is true and correct under the penalty of perjury.

13 Executed this 30th day of June, 2017 at Newport Beach, California.

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16 Douglas Molynaux
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 660 Newport Center Drive, 4th Floor, Newport Beach, CA 92660.

A true and correct copy of the foregoing document entitled (specify): **DEBTOR'S EX PARTE APPLICATION FOR EXTENSION OF TIME TO FILE SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS, LIST OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND CREDITOR MATRIX TO ACCOMPANY SCHEDULES; DECLARATION IN SUPPORT THEREOF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 30, 2017, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Frank Cadigan frank.cadigan@usdoj.gov
- Andrew B Levin alevin@winthropcouchot.com,
bayrelewin@hotmail.com;pj@winthropcouchot.com;vcorbin@winthropcouchot.com
- Robert E Opera ropera@winthropcouchot.com,
pj@winthropcouchot.com;vcorbin@winthropcouchot.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) June 30, 2017, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows.

Via Attorney Service - Bin by 5th Floor elevators

Honorable Catherine E. Bauer
Ronald Reagan Federal Bldg.
411 W. Fourth St., Suite 5165
Santa Ana, CA 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 30, 2017
Date

P.J. Marksbury
Printed Name

/s/ P.J. Marksbury
Signature